

**Transition Salt Spring Position on
Staff Report and Appendices being considered by LTC on March 7, 2024
LTC File Number 6500-20: SSI OCP LUB Update Project**

The following represents the Transition Salt Spring (TSS) position concerning the Staff Report and related appendices outlining the Terms of Reference and scope for the Complete Communities Assessment and the subsequent Official Community Plan Update Project as presented to the SSI LTC on March 7, 2024.

1. **OCP Update or Wholesale Review:** The Staff Report poses the fundamental question of whether or not the SSI LTC considers that the OCP requires changes in a limited number of areas or a wholesale review. The Report asks the LTC to answer this question by using Part A - Overall Goal and Objectives as a test.

After having reviewed Part A, TSS's position is that Part A of the SSI OCP Bylaw No. 434, 2008 is generally sound and supports TSS's positions as articulated in its Salt Spring Island Climate Action Plan, 2020-2030 and the [2023/24 Climate Action Report Card](#). TSS supports a targeted update of the OCP as articulated on page 2 of the Staff Report **except to say that the LTC's "prevailing concern" should not be limited to "increasing housing options and housing equity" but rather that these legitimate concerns be seen as inter-dependent with First Nations interests, ecosystem integrity and climate change resiliency. In other words, none of these elements is subordinate to the other and must be considered holistically.**

2. **Targeted Review Leading to a New Land Use Bylaw:** Following on TSS's position on Item 1, the focus for the OCP LUB project must be to **update the OCP only as necessary** and to develop a LUB that aligns with the amended updated OCP before the expiry of its term in 2026.
3. **Project Timelines:** TSS's position is that the Phase 2 timeline is too ambitious since most of its deliverables are in August 2024. A truly equitable public engagement would occur over September-October, not in the summer months when many islanders are not engaged in political matters.
4. **Scope of Community Engagement:**
 - a. **Community-led Engagement:** While it is true that island NGOs and groups have developed significant resources (e.g., Climate Action Plan, Area Farm Plan, and housing task force reports) that could be integrated into the OCP-LUB process, **these should not serve as proxies for a shared community vision**. TSS's position is that the Islands Trust and its community partners need to make the public aware of these community assets as a part of a Community Engagement Strategy. Further, TSS needs more information on what a **"community-led engagement process"** would look like before staking out a definitive position. Clear, transparent and equitably applied guidelines would need to be developed

to ensure that such a process would have broad community credibility. TSS is interested in working with the Islands Trust and other **civil society actors** to help flesh out such a process, leading to better community outcomes than through Islands Trust-led engagement alone.

- b. **The Role of Planning Commissions:** TSS does not have a definitive position on which of the three options presented by staff it supports, except to say that the selected commission and its members must reflect the scope of the OCP LUB exercise. **TSS would not, for example, support asking the Housing Action Program Task Force to comprise this commission role, for example, given the interdependency of housing, First Nation, environment and climate issues in the OCP LUB exercise.** Whatever the LCC decides, the selected vehicle must represent the issues. Further, the Islands Trust must also adequately support it, including providing honoraria or other payments to ensure equitable participation.
- c. **Civil Society Engagement:** Small communities like Salt Spring Island depend on a combination of government-delivered services and civil society groups who may deliver services on behalf of a level of government or who fill a known gap. While the list may not be complete, the organizations listed under Item 5 in the Staff Report Memo (p 117) are representative in this regard. Given the outsized contribution of civil society groups on Salt Spring to island life the Staff Report insufficiently leverages this capacity. There are two explicit areas where civil society groups could participate as outlined in the Staff Report and Memo.

One, is as a delivery agent for “Community-led Engagement” activities, and two, participation in the “Indicators Workshop.” The former requires a better definition before TSS can assess it, and the latter seems insufficient as this element would occur early on in the process during the Complete Communities Assessment phase wherein the “indicators” are limited to the 16 indicators outlined in the four theme areas in the Memo on pg 107 of the LTC package. To remedy this issue, TSS asks the Trust to broaden the “indicators” to incorporate the interdependent issues themes outlined in item one of this document. Further, given the role of civil society on SSI, the membership of the Agency Working Group seems overly limited. **The Trust should consider some kind of additional role for civil society on a working group or commission.** Lastly, further consideration must be given to formally including civil society input during Phase 2 of the process where the rubber hits the road.

For further information:

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